

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Atah H. Akakpo-Martin

Debtor 1

Suson E. Akakpo-Martin

Debtor 2

The Money Source, Inc.

Movant(s)

v.

Atah H. Akakpo-Martin

Suson E. Akakpo-Martin

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:21-BK-01810-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 51

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Atah H. Akakpo-Martin and Suson E. Akakpo-Martin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Upon information and belief, the averments as state in Paragraph 4 are admitted.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
8. Paragraph 8 contains a conclusion of law to which no response is required.
9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph

9; therefore, it is denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: November 30, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, November 30, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Denis Carlon, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire